

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA  
PITTSBURGH DIVISION**

<b>R. CATHY REARDON</b>	)	
<b>On behalf of herself and all</b>	)	
<b>similarly situated individuals,</b>	)	
	)	
<b>Plaintiffs,</b>	)	<b>Civil Action No. 2:08-cv-1730MRK</b>
<b>v.</b>	)	
<b>CLOSETMAID CORPORATION,</b>	)	<b>Hon. Judge Mark R. Hornak</b>
	)	
<b>Defendant.</b>	)	<b>Class Action</b>

**JOINT EXHIBIT LIST**

Class Representative Plaintiff, R. Cathy Reardon, by and through her undersigned counsel, on behalf of the Class, submits this Joint Exhibit List in accordance with the Court's November 13, 2013 Order (Docket 137) and Local Rule 16.1 C.

**EXHIBIT LIST OF DOCUMENTS EXPECTED TO BE OFFERED**

<b>Exhibit #</b>	<b>Date:</b>	<b>Author and Type of Document</b>	<b>Authenticity Objection</b>	<b>Response:</b>	<b>Admissibility Objection:</b>	<b>Response:</b>
<b>P-1</b>	WITHDRAWN	<del>Public Law 104-208, Sec. 2403</del>				
<b>P-2</b>	June 12, 1998	FTC Staff Opinion: Haynes-Hauxwell			F.R.E. 402, 403	
<b>P-3</b>	October 21, 1997	FTC Staff Opinion: Lamb-Steer			F.R.E. 402, 403	
<b>P-4</b>	August 31, 2004	Securint Application and Service Agreement (Bates 188-207)	AGREED		AGREED	
<b>P-5</b>		Applicant File for Cathy Reardon (Bates 208-236)	AGREED		AGREED	
<b>P-6</b>	April 19, 2007	Exemplar FCRA Form from Belle Vernon, Pa. location (Bates 285)	AGREED		AGREED	
<b>P-7</b>	March 14, 2005	Exemplar FCRA Form from Grantsville location (Bates 291)	AGREED		AGREED	
<b>P-8</b>	August 23, 2007	Exemplar FCRA Form from Ocala location (Bates 424)	AGREED		AGREED	
<b>P-9</b>	October 2, 2008	Exemplar FCRA Form from Chino, Ca. (not bated stamped)	AGREED		AGREED	

<b>P-10</b>	July 2009	Exemplar FCRA Form (Bates 440)	AGREED		AGREED	
<b>P-11</b>	December 18, 1997	FTC Staff Opinion: Haynes-Hawkey			F.R.E. 402, 403 (Doc. 143)	
<b>P-12</b>	June 9, 1998	FTC Staff Opinion: Haynes- Rosen			F.R.E. 402, 403 (Doc. 143)	
<b>P-13</b>	March 1999	“FTC FACTS for Business: Using Consumer Reports: What Employers Need To Know”. (FTC 1999) (Bates April Response 000001 – 000004)			F.R.E. 402, 403 (Doc. 143)	
<b>P-14</b>		PARTIAL/REDACTED Defendant ClosetMaid Corporation’s Supplemental Answers And Responses To Plaintiffs First Set Of Interrogatories and Request For Production Of Documents date August 14, 2009				
<b>P-15</b>	April 25, 2006	ClosetMaid Salaried Recruiting Procedure (Bates 164 – 187)	AGREED		AGREED	
<b>P-16</b>		Defendant ClosetMaid Corporation’s Answers and Responses To Plaintiff’s First Set Of Interrogatories and Requests For Production, Interrogatory No. 2 and Answer Thereto referring to an Exhibit A of documents including bates numbers 130				

		to 163 including documents relating to job applicants Edgar Garcia, (bates 130-141); Dawn Rust (bates nos. 141 to 158) and Walter Thomas (bates nos. 159-163).				
<b>P-17</b>	Subject to Order as to Docket No. 167	Fed. R. Civ. P. 1006 Summary of ClosetMaid Disclosure class files.				
<b>P-18</b>	Subject to Order as to Docket No. 167	Fed. R. Civ. P. 1006 Summary of ClosetMaid Pre-Adverse Action Sub-Class files.				
<b>P-19</b>	WITHDRAWN	<del>American Background, Background Package Pricing</del>				
<b>D-1</b>	May 2009	ClosetMaid's President's Office Organizational Chart (Bates 237)	AGREED		AGREED	
<b>D-2</b>	May 2009	ClosetMaid's Human Resources Organizational Chart (Bates 238)	AGREED		AGREED	
<b>D-3</b>	May 2009	ClosetMaid's Human Resources Ocala/CMNA Organizational Chart (Bates 239_	AGREED		AGREED	
<b>D-4</b>	May 2009	ClosetMaid's Human Resources Chino Organizational Chart (Bates 240)	AGREED		AGREED	
<b>D-5</b>	May 2009	ClosetMaid's Cambridge	AGREED		AGREED	

		Human Resources Organizational Chart (Bates 241)				
<b>D-6</b>	May 2009	ClosetMaid's Human Resources Grantsville Organizational Chart (Bates 242)	AGREED		AGREED	
<b>D-7</b>	WITHDRAWN AS DUPLICATIVE	<del>ClosetMaid's Salaried Recruiting Procedure (Bates 164-187)</del>				
<b>D-8</b>	WITHDRAWN AS DUPLICATIVE	<del>Securint Application and Service Agreement dated August 26, 2005 (Bates 188-207)</del>				
<b>D-9</b>	WITHDRAWN AS DUPLICATIVE	<del>LexisNexis Application and Agreement (Bates 192-196)</del>				
<b>D-10(a)</b>		American Background Check Package Pricing	F.R.E. 802	F.R.E. 803, 807, 901	F.R.E. 402, 403 and 802	F.R.E. 401, 402, 803, 807, 901
<b>D-10(b)</b>		American Background Authorization for Release of Information Form (Bates CMC 035959-35961)	F.R.E. 802	F.R.E. 803, 807, 901	F.R.E. 402, 403 and 802	F.R.E. 401, 402, 803, 807
<b>D-11</b>	January 21, 2002	Accurate Background Check Letter	F.R.E. 802	F.R.E. 803, 807, 901	F.R.E. 402, 403	F.R.E. 401, 402, 803, 807
<b>D-12</b>		ClosetMaid's Disposition Codes	F.R.E. 802	F.R.E. 803, 807, 901	F.R.E. 402, 403 and 892; Fed.R. Civ. P. 37(c)(1)	F.R.E. 401, 402, 803, 807; Boring Dep; Email correspondence from Vicki Ward to S.

						Hardy dated 11/27/13 w/Attachment
<b>D-13</b>	WITHDRAWN AS DUPLICATIVE	<del>Class Representative Reardon's Employment Application and accompanying submissions</del>				
<b>D-14</b>	WITHDRAWN AS DUPLICATIVE	<del>Letter to Class Representative Reardon dated December 18, 2006 (Bates 216)</del>				
<b>D-15</b>		"A Summary of your Rights Under the Fair Credit Reporting Act"				
<b>D-16</b>	WITHDRAWN AS DUPLICATIVE	<del>Class Representative Reardon's Credit Report (Bates 224-226)</del>				
<b>D-17</b>	WITHDRAWN AS DUPLICATIVE	<del>Class Representative Reardon's National Criminal Report dated December 15, 2006 (Bates 220-223)</del>				
<b>D-18</b>	WITHDRAWN AS DUPLICATIVE	<del>Letter to Class Representative Reardon dated December 22, 2006 (Bates 217)</del>				
<b>D-19</b>	Subject to Order as to Docket No. 167	Fed.R.Civ.P. 1006 Summary of Disclosure Class Files				
<b>D-20</b>	Subject to Order as to Docket No. 167	Fed.R.Civ.P. 1006 Summary of Pre-Adverse Action Sub-Class Files				
<b>D-21</b>	WITHDRAWN	<del>Exhibit A to Boring</del>				

		Affidavit				
<b>D-22</b>	WITHDRAWN	<del>Exhibit A to Hernandez- Opio Affidavit (Bates 5095)</del>				
<b>D-23</b>	WITHDRAWN	<del>Exhibit A to Dameron Affidavit (Bates 5098)</del>				

Additionally, Plaintiffs reserve the right to also rely upon and enter into evidence any exhibits identified by Defendant.

#### EXHIBIT LIST OF DOCUMENTS THAT MAY BE OFFERED

<b>Exhibit #</b>	<b>Date:</b>	<b>Author and Type of Document</b>	<b>Authenticity Objection</b>	<b>Response:</b>	<b>Admissibility Objection:</b>	<b>Response:</b>
<b>P-1</b>		PARTIAL/REDACTED Defendant ClosetMaid Corporation's Answers To Plaintiff's First Set Of Interrogatories Pursuant to The January 13, 2013 Order			Plaintiff objects if offered unredacted. F.R.E. 402, 403 and 802	Designations due 12/16/13
<b>P-2</b>		PARTIAL/REDACTED Defendant ClosetMaid Corporation's Answers To Plaintiff's First Set Of Document Requests Pursuant to The January 13, 2013 Order			Plaintiff objects if offered unredacted. F.R.E. 402, 403 and 802	Designations due 12/16/13
<b>P-3</b>	Subject to Order as to Docket No. 167	Applicant files of Disclosure Class Members				
<b>P-4</b>	Subject to Order as to Docket No. 167	Applicant files of 68 members of Pre-adverse Action Sub-class				

<b>P-5</b>		Printed copy of: <a href="http://www.emerson.com/en-US/about/investor-relations/emerson-businesses/Pages/Commercial-Residential-Solutions.aspx">http://www.emerson.com/en-US/about/investor-relations/emerson-businesses/Pages/Commercial-Residential-Solutions.aspx</a>			F.R.E. 402, 403 (Doc. 141, 142)	
<b>P-6</b>	Subject to Order as to Docket No. 167	ClosetMaid Adverse Action Subclass Chart (Bates No. 279)				
<b>P-7</b>	WITHDRAWN AS DUPLICATIVE	<del>ClosetMaid Organizational Charts (Bates No. 237-242)</del>				
<b>P-8</b>	March 2003	ClosetMaid Employee Handbook, (Bates No. 243-278)	AGREED		AGREED	
<b>P-9</b>	WITHDRAWN	<del>ClosetMaid Current Disposition Codes</del>				
<b>D-24</b>	Subject to Order as to Docket No. 167	Applicant Files of Disclosure Class Members				
<b>D-25</b>	Subject to Order as to Docket No. 167	Applicant Files of Pre-Adverse Action Sub-Class Members				
<b>D-26</b>	WITHDRAWN AS DUPLICATIVE	<del>ClosetMaid Handbook (Bates 243-278)</del>				
<b>D-27</b>	WITHDRAWN AS DUPLICATIVE	<del>Exemplar Application and forms from Belle Vernon location</del>				
<b>D-28</b>	WITHDRAWN AS DUPLICATIVE	<del>Exemplar Application and forms from Grantsville location</del>				



<b>D-29</b>	WITHDRAWN AS DUPLICATIVE	<del>Exemplar Application and forms from Ocala location</del>				
<b>D-30</b>	WITHDRAWN AS DUPLICATIVE	<del>Exemplar Application and forms from China location</del>				
<b>D-31</b>	WITHDRAWN AS DUPLICATIVE	<del>“Combined Disclosure Notice and Authorization to Obtain Consumer Report”</del>				
<b>D-32</b>	Subject to Order as to Docket No. 167	ClosetMaid Sub-Class Chart (Bates 279)				
<b>D-33</b>	December 18, 1997	FTC Staff Opinion: Haynes				
<b>D-34</b>	June 27, 1997	FTC Staff Opinion: Brinckerhoff				
<b>D-35</b>	June 11, 1998	FTC Staff Opinion: Haynes				
<b>D-36</b>		Plaintiff’s Answers and Objections to Defendant’s Second Set of Interrogatories			Plaintiff objects if offered unredacted. F.R.E. 402, 403	Designations due 12/16/13
<b>D-37</b>		Plaintiff’s Objections and Responses to Defendant’s Second Request for Production of Documents			Plaintiff objects if offered unredacted. F.R.E. 402, 403	Designations due 12/16/13
<b>D-38</b>		Plaintiff’s Objections and Responses to Defendant’s First Requests for Production of Documents			Plaintiff objects if offered unredacted. F.R.E. 402, 403	Designations due 12/16/13

<b>D-39</b>		Plaintiff's Answers and Objections to Defendant's First Interrogatories			Plaintiff objects if offered unredacted. F.R.E. 402, 403	Designations due 12/16/13
<b>D-40</b>		ClosetMaid's Answers to Plaintiff's First Set of Interrogatories Pursuant to the Court's January 11, 2013 Order	Plaintiff objects if offered unredacted. F.R.E. 802		Plaintiff objects if offered unredacted. F.R.E. 402, 403 and 802	Designations due 12/16/13
<b>D-41</b>		ClosetMaid's Answers to Plaintiff's First Set of Requests for Production Pursuant to the Court's January 11, 2013 Order	Plaintiff objects if offered unredacted. F.R.E. 802		Plaintiff objects if offered unredacted. F.R.E. 402, 403 and 802	Designations due 12/16/13
<b>D-42</b>		ClosetMaid's Supplemental Answers and Responses to Plaintiff's First Set of Interrogatories and Requests for Production of Documents	Plaintiff objects if offered unredacted. F.R.E. 802		Plaintiff objects if offered unredacted. F.R.E. 402, 403 and 802	Designations due 12/16/13
<b>D-43</b>		ClosetMaid's Answers and Responses to Plaintiff's Second Set of Interrogatories and Requests for Production of Documents	Plaintiff objects if offered unredacted. F.R.E. 802		Plaintiff objects if offered unredacted. F.R.E. 402, 403 and 802	Designations due 12/16/13
<b>D-44</b>		Emerson Electric's Answers and Responses to Plaintiff's First Set of Interrogatories and Requests for Production	F.R.E. 802		Plaintiff objects if offered unredacted. F.R.E. 402, 403 and 802	Designations due 12/16/13
<b>D-45</b>		ClosetMaid's Answers	Plaintiff objects if		Plaintiff objects if	Designations due

		and Responses to Plaintiff's First Set of Interrogatories and Requests for Production	offered unredacted. F.R.E. 802		offered unredacted. F.R.E. 402, 403 and 802	12/16/13
<b>D-46</b>	WITHDRAWN	<del>Fair Credit Reporting Act, 15 U.S.C. §1681 <i>et seq</i></del>				
<b>D-47</b>		File for Cathy Reardon (P-5 and D-15)				

Respectfully submitted,

By: /s/ James M. Pietz

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing JOINT EXHIBIT LIST was filed electronically on December 13, 2013. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ W. Scott Hardy

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Counsel for Defendants